

JUN 28 2012

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Article Number: 7011 0470 0002 2747 5643

Mr. Joel Zirkle P.G.
Branch Manager
Fehr-Graham & Associates
1920 Daimler Road
Rockford, Illinois 61112

RE: Sauer-Danfoss Facility
Ames, Iowa
Annual Site Sampling Report Comments

Mr. Zirkle:

The United States Environmental Protection Agency has reviewed 2012 Annual Site Sampling Report for the Sauer Danfoss facility, dated May 21, 2012, and has developed the enclosed comments. The EPA would like to point out that the enclosed comments are not a comprehensive list of every omission or error found in the document. The EPA noted several additional errors associated with the accuracy of data presented in the figures and tables. Sauer Danfoss should review all the figures, tables and analytical data submittals to ensure that the analytical data are presented accurately. Sauer Danfoss should also ensure that once the tables and figures are corrected that the text of the document accurately reflects the supporting data. Please revise the above referenced document per the enclosed comments and your own comprehensive review of the data and the figures and resubmit the document to the EPA within 30 days of your receipt of this letter.

If you have any questions regarding this letter, please contact me at (913) 551-7392.

Sincerely,

Robert E. Aston
Corrective Action Officer
Waste Remediation and Permitting Branch
Air and Waste Management Division

Enclosure

AWMD/WRAP/KNRP/RA:bft:06/22/12:H:AWMD/WRAP/Cores12/RA:Sauer-Danfoss.2011 Annual
Rpt.doc

KNRP

Aston

06/26/12

MIRP

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Johnson

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RCRA



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**Comments on
Sauer Danfoss Facility – Ames Iowa
2012 Annual Site Sampling Report**

General Comments

Revise the title of the document to 2011 Annual Site Sampling Report. The document actually presents the data which was collected in 2011.

Specific Comments

1. Page 2, paragraph 2. Revise the text to correct the typographical error. PCR should be PCE.
2. Page 3 – Monitoring Well Installation. The text states that three wells (MW-14R, MW-29, and PZ-2) were abandoned and replaced and that the replacement wells are depicted on Figure 1. The figure shows the location of the replacement wells with the exception of PZ-2. Revise the figure to include PZ-2.
3. Page 7 – Data Validation. The text indicates that samples were received at the lab at a temperature of 5.8 degrees Celsius and 5.5 degrees Celsius during the October 2011 and July 2011 sampling events, respectively. Samples must be maintained at a temperature of 4.0 degrees Celsius. In future sampling events, add more ice to the sample cooler as needed to maintain a temperature of 4 degrees Celsius.
4. Figure 2 – Groundwater Analytical Results Above Quantitation Limit October 19, 2011. There is a discrepancy between Table 5 (Groundwater Analytical Results) and the figure. Groundwater analytical data from October 2010 are shown on the figure. Revise the figure to show the October 2011 data.
5. Figure 3 – Groundwater Analytical Results Above Quantitation Limit – Comparison of October 19, 2011, July 19, 2011, and December 12, 2011 Sampling Events. The data shown in red are from October 2010 rather than October 2011. In addition, the analytical results from July 2011 are not provided on the figure. Revise the figure to use the October 2011 data and also include the July 2011 data.
6. Figure 4 – Shallow Groundwater 1,1 – DCA Concentrations October 19, 2011. See previous comment 4. Revise the iso-concentration contours, as needed.
7. Figure 5 – Shallow Groundwater 1,2 – DCE Concentrations October 19, 2011. The result for the sample collected from MW-20 was <10.0 according to Table 5. Revise the figure accordingly.
8. Figure 6 – Shallow Groundwater 1,1 – DCE Concentrations October 19, 2011. The result for the sample collected from MW-20 was <20.0 according to Table 5. Revise the figure accordingly.
9. Figure 10 – Shallow Groundwater Methylene Chloride Concentrations October 19, 2011. Revise the figure to include the result for MW-R13.
10. Figure 12 – Shallow Groundwater 1,1,1-TCA Concentrations October 19, 2011. The result associated with the sample from MW-18 was <1.0 according to Table 5. Revise the document so that the figure and table are in agreement.

11. Figure 16 – Shallow Groundwater Xylene October 19, 2011. The sample result associated with well MW-10 is <15.0 according to Table 5. Revise the document so that the figure and the table are in agreement.
12. Hydrogeologic Profiles - Figures 17 through 28. There is a discrepancy between Table 5 (Groundwater Analytical Results) and the figures. Groundwater analytical data from October 2010 are shown on the figure. Revise the figures to show the October 2011 data.
13. Figure 24 – Hydrogeologic Profile, Tetrachloroethene Concentrations October 19, 2012. Revise the figure title to change the date from 2012 to 2011.
14. Figures 29 through 38. Review the figures against the analytical data provided in Table 5 and revise the figures if needed.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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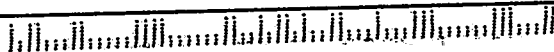
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